

LAKEHAVEN UTILITY DISTRICT

31627 1st Ave South • P.O. Box 4249 • Federal Way, Washington 98063-4249
Federal Way: 253-941-1516 • Tacoma: 253-927-2922
www.lakehaven.org

May 26, 2011

RECEIVED
JUN 02 2011
KING COUNTY DDES

Mr. Paul Reitenbach
Growth Management Planning Council
King County DDES

Re: King County Countywide Planning Policies

Dear Mr. Reitenbach:

As the elected representatives of the customers of the Lakehaven Utility District, we write to comment on the proposed 2011 updates to the King County Countywide Planning Policies.

As background to our comments, the Lakehaven Utility District has been providing water and sanitary sewer service within an Urban Growth Area located in the southwest portion of King County for over 50 years. The more than 115,000 customers we provide these services to reside in seven (7) cities, as well as significant areas of unincorporated King County (we also serve a small area within Pierce County). We believe that the District has maintained a long and consistent record of delivering reliable and cost effective utility service to these customers. Being elected by our ratepayers, we are directly accountable to them for the water and sewer service they receive.

Much of what is proposed in these policies is appropriate and beneficial to the governance you provide. We believe, however, that Section PFS-3 of the policies significantly overstates the role cities were intended to play in the provision of urban services under the Growth Management Act (GMA). The GMA provides only that "in general" cities are the appropriate providers of these services in the Urban Growth Areas (UGA).

As currently drafted, the proposed language in the Section PFS-3 does not take into account the fact that many districts serve within more than one city and serve to bridge the gap between the services provided by adjoining and non-adjoining cities. To correct this, we suggest that your language be modified as follows:

First sentence - Except where services are provided by a special purpose district with territory in more than one city, in which case the special purpose district shall be presumptively regarded as the appropriate provider, cities are generally presumed to be the appropriate provider of services within the UGA.

Leonard D. Englund	Charles I. Gibson	Timothy A. McClain	Donald L.P. Miller	Ronald E. Nowicki
Commissioner	Commissioner	Commissioner	Commissioner	Commissioner

Second sentence - Urban services within PAA's may be extended by a special purpose district only in conformance with the comprehensive plan of the special purpose district, as such plan shall have been approved by the city with jurisdiction over the PAA.


Third sentence - The third sentence is unnecessary and should be deleted.

Special purpose districts play an important role in the delivery of urban services in King County. There is no reason that this can't, or shouldn't, continue under the GMA. The coordination of urban services that is so fundamental to the GMA is attainable without cities taking over the role of special purpose districts. The most significant act of coordination occurs as districts submit comprehensive plans for review and approval to every city that has jurisdiction over the area in which the district provides service.


We thank you for the opportunity to comment on your proposed policy updates.

Sincerely,

LAKEHAVEN UTILITY DISTRICT BOARD OF COMMISSIONERS



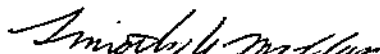
Ronald E. Nowicki, President



Leonard D. Englund, Vice President



Charles I. Gibson, Secretary



Timothy A. McClain, Commissioner



Donald L.P. Miller, Commissioner

cc: King County Councilmembers
Scott McKinnie, WASWD

Leonard D. Englund	Charles I. Gibson	Timothy A. McClain	Donald L.P. Miller	Ronald E. Nowicki
Commissioner	Commissioner	Commissioner	Commissioner	Commissioner